Ameritech provides the same, or similar, pre-ordering information to CLECs. Because the NPRM does not define these categories, however, it is impossible to be sure. Accordingly, some potential, but subtle, variations should be noted at the outset. First, the NPRM includes Feature Function Availability and Service Availability as separate functions. Since a definition is not provided, Ameritech assumes that these functions correspond to Ameritech's Feature Function Availability and its Street Address Guide, which provide the same data.

Second, the NPRM includes Facility Availability as a separate function. Ameritech provides this functionality as part of the Due Date Selection function, because Ameritech's systems check for existing facilities prior to generating a list of available due dates. For the same reason, Ameritech assumes that "Due Date Reservation and Appointment Scheduling," as set forth in the NPRM, are subsumed in Ameritech's Due Date Selection function.

For functions provided in real time (that is, in response to on-line inquiries through an electronic interface), Ameritech concurs that the measurement definition and calculation appear to provide for a proper assessment of CLEC experience with the pre-ordering function. Ameritech thus recommends that it report average response time for the following real time (*i.e.* on-line) functions:

- Customer Service Record
- Address Validation
- Telephone Number Selection
- Due Date Selection (which includes Due Date Reservation, Facility Availability, and Appointment Scheduling)

A precise retail analog for the above functions would not be cost-beneficial, because retail transactions do not pass through (and therefore cannot be measured by) an interface. Commercial software is available, however, that allows one to simulate the performance of an electronic system using sample transactions. Ameritech proposes that it generate and provide a retail comparison for average response time using emulation of the retail system by such commercial software.[4/]

It is important to note that the nature of the competing carrier request (e.g. number of lines, complexity of customer, time of day, length of record) causes large variability in the measurement results. Ameritech thus recommends that it be allowed to investigate and report an additional level of detail, should the results of the above analysis raise concerns as to timeliness or parity of pre-ordering functions.

As the NPRM properly recognizes (¶ 44), certain pre-ordering information is not provided in real time but by CD-ROM or Direct Connect, a file transfer protocol that allows Ameritech to transfer files to CLECs. This procedure is used for information (such as central office features) that is sufficiently static so as not to require constant update or on-line access. For these functions, the measurement definition should be based on the timeliness of the CD-ROM delivery or file transfer rather than average response time, which depends on the speed

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4/ The proposed system would generate transactions that would emulate the responses for an Ameritech service representative inputting CLEC transactions. The software, known as RoadRunner (by Mercury) would create the transaction, submit it and receive the related responses. As an example: a customer service record would be requested simulating the result that would occur if the type of request submitted through electronic interfaces were instead processed by the Ameritech retail system. Both requests would be submitted and measured using the emulation software.

of the CLEC's own access system. Requiring the incumbent to measure this is not feasible, nor would it provide useful information regarding incumbent performance. In addition, there is no retail analog for these methods of information transfer. Ameritech thus recommends that it measure average delivery time for the following functions provided by CD-ROM or file transfer:

- Feature Function Availability
- Service Availability (i.e. Street Address Guide)

The NPRM includes Rejected Query Notices as a separate function. Ameritech proposes to provide an average rejected query response time and a percentage of rejected queries for each on-line function. The rate of rejection responses varies based on the type of query, and should not be combined as the Notice proposes. Further, some clarification is necessary with respect to the definition of a "rejection." Rejected queries include unreadable transactions or instances when appropriately formatted transactions cannot be processed. They should not, however, include "valid returns" -- for example, where a CLEC submits a request for available telephone numbers in a particular area and none are available, and the system appropriately responds that telephone numbers are unavailable.

In summary, Ameritech proposes the following wholesale measures and levels of disaggregation:

Real time (i.e. on-line) functions:

- Customer Service Record (disaggregated by size of record):
  - Average Response Time – Accepts
  - Average Response Time – Rejects
  - Percent Rejects
- Address Validation (On-line Street Address Guide):
  - Average Response Time – Accepts
  - Average Response Time – Rejects
  - Percent Rejects
- Telephone Number Selection:
  - Average Response Time – Accepts
  - Average Response Time – Rejects
  - Percent Rejects
- Due Date Selection:
  - Average Response Time – Accepts
  - Average Response Time – Rejects
  - Percent Rejects

Non-real time functions:

- Feature Availability – Timeliness of distribution of the CD-ROM or timeliness of file transfer (Direct Connect)
- Service Availability (i.e. Street Address Guide) – Timeliness of distribution of the CD-ROM or timeliness of file transfer (Direct Connect)

Retail Equivalents: A retail equivalent would be provided for each on-line function using the emulation approach described above.

2. Ordering and Provisioning Measurements

a. Disaggregation of Data

The Commission seeks comment on the level of disaggregation it proposes for the various performance measures. NPRM, ¶¶ 46-51. Specifically, the Commission proposes 13 measurement categories for order completion measurements, order status measurements, held

orders measurement, the installation troubles measurement, and the repair and maintenance measurements. NPRM, ¶ 46. (These 13 categories apply to CLEC transactions; an additional 6 categories are proposed for incumbent LEC transactions, making 19 categories in all.)

Disaggregation of performance data is not without its costs. Increasing the number of reporting categories increases the cost of gathering data and of producing performance reports, and it can also reduce the statistical reliability of such reports by reducing sample sizes. Thus, Ameritech recommends that the Commission employ a two-step approach for evaluating potential categories of disaggregation.

First, an additional level of detail for a given measure should not be considered unless it adds meaning to that measure. In other words, the results of performance on that measure should be consistently and materially different for a subset of the data population, in order to justify a separate reporting category for that subset.

If, and only if, an additional measurement category adds meaning, it must pass a second test -- the test of cost-effectiveness. The category should not be added unless the benefit provided, in terms of increased utility of performance reports, meets or exceeds the cost of gathering and reporting data on that level -- *e.g.*, the costs of electronic programming modifications necessary to identify, isolate, and track transactions falling within the proposed category.

The above approach provides a concrete method for implementing the Commission's attempt "to balance our goal of detecting possible instances of discrimination with our goal of minimizing, to the extent possible, burdens imposed on incumbent LECs." NPRM, ¶ 46.

Ameritech employs this two-part test to the proposed categories associated with each measure advanced in the NPRM, in conjunction with its comments on those individual performance measures below. Because the Commission proposes to require a standard set of 19 performance categories across several performance measures, two general observations will highlight recurring issues and further illustrate the proposed two-step approach.

First, six of the 19 measurement categories segregate orders based on whether they require the dispatch of field personnel. For wholesale and retail orders alike, the Commission segregates residential, business, and special orders according to the need for such dispatch. The Commission would uniformly require separate categories for such orders with respect to all performance measures in the areas of order completion, order status, held orders, installation troubles, and repair and maintenance. For some measures, the dispatch/ non-dispatch distinction has meaning, and passes the first part of the disaggregation test. Dispatch typically affects the time required to complete an order.

For numerous other measures, however, the dispatch/ non-dispatch breakdown does not have meaning. In particular, dispatch does not affect the electronic functions associated with generating and issuing order status reports, such as rejection notices, order confirmations, and completion notices. Dispatch does not occur until *after* an order is accepted; thus, it does not affect the time associated with issuing a notice of rejection or confirmation. Meanwhile, dispatch is completed before a completion notice is generated and sent, and thus does not affect the time involved in providing such notice. Thus, the Commission's proposed addition of

"dispatch" and "non-dispatch" categories does not add meaning to the various measurements of order status, fails to meet the threshold test for disaggregation, and should be eliminated.

Second, throughout the Notice, the Commission proposes that various measurements separately report incumbent LEC performance with respect to "combinations" of unbundled network elements, an undefined term. As the Commission is aware, section 251(c)(3) provides, and the Eighth Circuit has held, that incumbent LECs are not required to combine network elements. Rather, they need only provide separate elements "in a manner that allows requesting carriers to combine such elements in order to provide telecommunications service."

It is therefore Ameritech's position that combinations of network elements merely involve the provision of separate elements by the incumbent for combination by the CLEC. Under this definition, the incumbent's performance should not be disaggregated, but rather should be included with its performance with respect to the underlying separate elements that comprise the combination.

b. Order Completion Measurements

Average Completion Interval (NPRM, ¶ 53 & App. A, § II.A.1). This measurement "seeks to compare the average length of time it takes an incumbent LEC to complete orders for competing carriers with the average length of time it takes to complete comparable incumbent LEC retail orders." NPRM, ¶ 53. The tentative measure proposed in the NPRM, however, does *not* measure the length of time it takes an incumbent LEC to complete orders for competing carriers. Instead, it *adds* to the completion interval the time the incumbent takes to issue a notice to CLECs *after* an order has been completed -- a measure that is already provided below as the

"average completion notice interval." As such, the proposed measurement for CLEC orders does not provide a valid comparison to the retail measurement that the Commission proposes for comparison (which includes only the completion interval, not the notification interval), nor is it consistent with the CLEC measurement that the Commission itself has developed in previous rulings (under the name "average installation interval"). The NPRM itself acknowledges that "the proposed Average Completion Interval proposed in this proceeding differs somewhat from the [Commission's] *BellSouth South Carolina Order*." NPRM, ¶ 53 n.78.

Ameritech submits that the Commission's change of direction is inappropriate and unnecessary. Ameritech proposes a pure "Average Completion Interval" that would measure the time required for completion (which the NPRM proposes to apply only to incumbent LEC orders) without adding the time for completion notification (which the NPRM proposes to add only to CLEC orders). This calculation more accurately meets the objective of the NPRM measure, that is, the time to complete orders. Further, a consistent definition across wholesale and retail will provide an appropriate comparison of performance: Adding an additional component to the CLEC order measure will skew results, create a false appearance of disparity where none exists, and reduce the comparability and thus the utility of the measure. Finally, the average interval for completion notification is already captured in a separate measurement below. Including the same interval in this measure would be redundant. To the extent that "average completion interval plus average completion notice interval," as suggested in the NPRM, has any utility, that information would still be available from the reports proposed by Ameritech here. The reader would simply add the pure version of "Average Completion

Interval" defined by the FCC in its *BellSouth South Carolina Order*, and supported by Ameritech here, to the pure "Average Completion Notification Interval" described below.

Ameritech also objects to the formula presently contemplated for this measure, because it is not cost-effective. The NPRM proposes that the completion interval for each individual order be measured to the hour and minute in computing the overall average. Ameritech's wholesale interfaces record the time of order receipt, but record only the date, not the time, of completion. Further, most of Ameritech's retail systems record only the day of an order's receipt and the day of its completion -- in other words, they do not contain a "time" stamp for the hour and minute. Recording and tracking the hour and minute of retail order entry and completion would require a complete redesign of Ameritech's ordering and provisioning systems. For example, most of the provisioning systems today do not take into account the time the order is due, just the date. Likewise, Ameritech's reporting processes and reporting systems for provisioning record by date, not time. The Work Force Administration (WFA) system does not have a capability for entering the actual time an order was completed. Likewise, the downstream provisioning systems would need to know the exact time an order is due if time becomes a requirement for reporting purposes. A rough estimate on the costs to modify the provisioning systems and the data warehouse system for reporting on time would be about $16 million. (This does not take into account any modifications required for the ordering system.) And the time required to implement these measures could run from one to two years. On balance, the minimal benefit of refining data to the minute is outweighed by the associated costs.

The Notice appropriately excludes canceled orders, and incumbent LEC orders associated with the internal or administrative use of local services, from the calculation of average completion interval. The proposed exclusion of orders supplemented by a competing carrier, however, would require a costly redesign of ACIS, which does not currently identify such orders, and Ameritech therefore does not support such an exclusion. And, in addition to the exclusions proposed in the Notice, Ameritech recommends that the Commission exclude orders where the customer is not ready or cannot provide premises access, and where the customer chooses its own due date and does not accept the earlier company-offered installation appointment. The Commission endorsed such an exclusion in its *Ameritech Michigan Order*, because the incumbent should not be penalized for fulfilling the customer's requests. Ameritech also proposes additional exclusions and clarifications as detailed in Appendix A of this document.

Ameritech agrees with the categories for disaggregation that have been proposed for order completion measurements with some minor changes. Ameritech proposes disaggregation based on field visit vs. non-field visit rather than dispatch vs. non-dispatch. (The dispatch indicator can be used to indicate either field dispatches or central office dispatches.)

Likewise, the measurement breakdown for Unbundled Loops between those with Interim Number Portability ("INP") and without INP does not make sense. One of the advantages of unbundled elements is that CLECs may order unbundled elements individually and connect them to their own or someone else's equipment or facilities. This allows the carrier to take an unbundled loop from Ameritech and connect it to a long-term number portability ("LNP")

telephone number. In this case, Ameritech has the work on the unbundled loop and the carrier controls sending the activate message to the third party database administrator, Lockheed Martin, who runs the Number Portability Administration Center ("NPAC") that releases the messages to transfer the number from one carrier to another. Ameritech has no control over the LNP activation and cannot be responsible for measuring this order with unbundled loops as Ameritech is not involved nor does it receive the LNP order.

With regard to INP, in anticipation of long-term number portability and the fact that carriers can order INP and unbundled loops separately if they so choose, Ameritech designed its process such that these orders are totally separate orders. These orders are coordinated to ensure that end user is not adversely impacted; however, the fact remains that the orders are totally separate. For reporting purposes, there is no way for Ameritech, using its existing systems and processes, to report separately Unbundled Loops with INP and without INP. It makes no sense to redesign the process or reporting functions since Interim Number Portability is just that -- interim.

Further, Ameritech's current schedule is to have all existing INP converted to long-term number portability ("LNP") by February, 1999. The last LATA where Ameritech has INP today will be converted to LNP by September 1998, and competing carriers will have 120 days to convert their existing customers from INP to LNP. Based on this schedule, Ameritech objects to the proposed disaggregation for INP, as it is not appropriate in an LNP environment and is not cost justified for the short time that INP will be around.

Next, since the installation interval for interconnection trunks is, for new networks, a negotiated interval resulting from joint planning sessions, the average completion interval measurement serves no purpose. Indeed, telecommunications carriers who engage in careful planning can appear to have longer intervals, which could be falsely interpreted as a performance problem. The "percentage of due dates missed" measure, which follows this one, is thus the better measure of timely provisioning for interconnection trunks. And for established networks, this measure is subsumed by the call completion metric discussed in detail below. Ameritech thus recommends that interconnection trunks be excluded from the "average completion interval" measure.

Finally, while the proposed measure provides useful information to the CLEC and/or the incumbent LEC, it must be noted that it cannot, on its face, be used for an apples-to-apples comparison. The average completion interval experienced by a reseller can only be considered valid, for comparison to retail operations, if the reseller uses the same methodologies as the retail units employ; that is, if the reseller takes advantage of the pre-ordering interfaces.

Therefore, the average order completion metric should be used as a starting point for further analysis and action planning by the incumbent LEC and the CLEC. It can be used to foster more efficient and effective operations on the part of both parties. At the same time, one must also keep in mind the potential limitations in comparing CLEC and retail data.

Percentage of Due Dates Missed (NPRM, ¶ 54 & App. A, § II.A.2). This metric measures the percentage of orders completed after the due date, where the reason for delay is attributable to the incumbent LEC. While Ameritech concurs with the measurement *objective*

(assessing timeliness of order provisioning), the proposed methodology is subject to the same deficiencies as the average completion interval discussed above. First, as with average completion interval, the proposed measure for missed due dates does *not* measure the timeliness of the actual completion of the order (which is the measure most relevant to the end user) but instead adds the time associated with completion *notice*. As such, this proposed measure for missed due dates duplicates the measure of completion notification timeliness below, and fails to make a valid comparison between wholesale and retail orders. Thus, the time incurred in sending a completion notice should be excluded from this measure.

Likewise, the NPRM proposes that due date performance be assessed by date *and time*. As the preceding section demonstrates, recording and then tracking the hour and minute of retail order submission and completion would require an expensive redesign of Ameritech's provisioning systems, and is cost- and time-prohibitive.

Ameritech further recommends the exclusion of misses caused by the customer or the end user not being ready (as happens, for example, when customer-ordered premises equipment does not arrive in time) or when the end user is not available to provide access to the premises in those cases where access is required. Ameritech also proposes additional exclusions and clarifications as detailed in Appendix A hereto.

Ameritech recommends the disaggregation categories be the same as those advocated for average completion interval, with the addition of interconnection trunks to this measure.

c. <u>Average Time for Coordinated Customer Conversions</u>

The stated purpose of this measure (NPRM, ¶ 57 & App. A, § II.B) is to determine how long an end user is without local exchange service when service is converted to a CLEC that uses the incumbent's unbundled loop to provide such service -- or, more specifically, the time between removal of the jumper wire from central office equipment on the Main Distribution Frame ("MDF"), and its connection to the Connecting Facility Assignment ("CFA") that runs to the CLEC's collocation space equipment.

Ameritech's existing electronic systems do not and cannot record the information necessary for the proposed calculation. Instead, a central office technician would have to manually note the exact time he or she pulled the old jumper, as well as the time he or she terminated the CLEC's jumper to the CLEC's frame. The manual recording involved would be time-consuming, imprecise, and would distract incumbent LEC field personnel from their primary task of installing and maintaining service.

The proposed interval would include time associated with factors that are beyond the incumbent's control. First, if the end user is on the line at the time conversion is scheduled, the conversion cannot go forward. Second, under Long-Term Number Portability ("LNP"), the CLEC -- not the incumbent LEC -- sends the activating message to a third-party number portability database administrator; the incumbent has no control over this process, and no knowledge of when it is complete. Third, many conversions require the presence of a CLEC's third party vendor, who may cause delays.

Because electronic recording and tracking is not feasible, this measure would require manual recording that entailed a series of "judgment calls" in which the persons responsible for

recording data would have to manually assess and try to eliminate the impact of non-incumbent factors on the measure. All of these factors would lead to a highly imprecise measure, and would distract technicians from the real work of performing the conversion in a timely fashion.

In addition, the proposed measure is fraught with practical difficulties. Although it may be possible to manually track Ameritech work on single-line conversions, the Notice does not define the calculation method for multiple-line conversions. Such conversions would also distort results, because the fixed time involved for setting up a conversion would presumably be allocated among numerous lines. Attempting to disaggregate or otherwise account for this phenomenon would result in another substantial drag on technician time.

On balance, then, Ameritech maintains that any benefit of this measure is far outweighed by its costs, its imprecision, and the distraction it would cause from providing timely service and therefore opposes this measure.

d. Order Status Measurements

Average Reject Notice Interval (NPRM, ¶ 60 & App. A, § II.C.1). As with other incumbent LECs, Ameritech's order interface edits CLEC orders for format and content. CLEC orders that are improperly formatted, that use improper syntax, or that do not contain proper data, are returned to the CLEC via the interface with a rejection notice. The purpose of the measurement is to assess the amount of time it takes an incumbent LEC to notify the competing carrier that an order has been rejected.

Ameritech supports the measurement definition and calculation set forth in the NPRM (¶ 60), which appear to provide for a proper assessment of the time required to process and send

a rejection notice. Ameritech further agrees with the Commission's tentative conclusion that "because incumbent LECs access their systems electronically for retail purposes, we tentatively conclude that incumbent LECs need measure only the access they provide electronically to competing carriers." As a result, Ameritech agrees that it should report this measure on electronically received orders only.

Ameritech does not concur, however, with the NPRM's proposed 19 levels of disaggregation, which would be unduly burdensome and expensive to implement, and which would not add any utility to the reports. The NPRM would require separate reporting of the rejection notice interval for the following order categories:

Wholesale

- Resale Residential POTS
  - dispatch
  - non-dispatch
- Resale Business POTS
  - dispatch
  - non-dispatch
- Resale Specials
  - dispatch
  - non-dispatch
- Unbundled Loops
  - w/ interim number portability (INP)
  - w/o INP
- Unbundled Switching
- Unbundled Local Transport
- Combinations of UNEs
  - dispatch
  - non-dispatch
- Interconnection Trunks

Retail

- Retail Residential POTS
  - dispatch
  - non-dispatch
- Retail Business POTS
  - dispatch
  - non-dispatch
- Retail Specials
  - dispatch
  - non-dispatch

The dispatch/ non-dispatch distinction is not a meaningful one for rejection notices, because it does not affect the speed of their issuance. Whatever effect the dispatch of personnel

may have on the time to *complete* an order, the fact of dispatch, in and of itself, does not affect the initial electronic review of an order for syntax and format, or the time required to notify the CLEC of the order's rejection. The determination of whether dispatch is required to complete an order is not made until after the order is accepted.

Further, the proposed segregation of Unbundled Transport and EOI (Interconnection Trunks) is unnecessary, since these orders are never rejected. Ameritech works with each competing carrier throughout the negotiation and submission process to ensure that these orders are properly formatted and phrased by the time of actual submission.

Ameritech recommends that orders for Interim Number Portability not be measured for the same reasons described in the previous discussion of average completion intervals.

The NPRM properly recognizes that certain forms of notice provided to CLECs do not have a direct retail analog, and seeks "comment on the appropriate retail analog that should be measured." NPRM, ¶ 59. In this regard, Ameritech notes that it does not provide itself with rejection notices in the course of its normal retail operations, because this form is unique to the electronic interface through which Ameritech provides CLECs with access to its ordering functions. As an appropriate retail analog, Ameritech proposes that it measure and report the rejection notice interval for its "win-back" operations. Ameritech personnel use the same electronic interface for submitting "win-back" orders that CLECs use for wholesale orders, thus ensuring comparability. Also, the use of a win-back analog is sufficient to detect instances of discriminatory treatment.

Average FOC Notice Interval (NPRM, ¶ 61 & App. A, § II.C.2). Once a properly formatted order passes the edit checks in the ordering interface, Ameritech provides the CLEC with a notice confirming the order, which is commonly referred to as a "Firm Order Confirmation" or "FOC" and which is also called a form "855." The purpose of this measurement is to assess the amount of time it takes to send such confirmation to the competing carrier.

As with the rejection notice interval above, Ameritech supports the measurement definition and calculation set forth in the NPRM (¶ 61), concurs that it should report this measure on electronically received orders only, and agrees that rejected orders should be excluded from this measurement (¶ 61). And, as with rejection notices, Ameritech disagrees with the proposed 19-level disaggregation, and specifically maintains that the segregation of dispatch and non-dispatch orders be eliminated as meaningless in this context, and because its costs outweigh any possible benefit. Dispatch does not occur until after confirmation, and thus does not affect the speed of confirmation. Ameritech supports the same categories of disaggregation as described with respect to rejection notices, along with the additional categories specified in Appendix A hereto.

Ameritech further recommends that "win-back" orders be used here as an appropriate retail analog for comparison.

Average Jeopardy Notice Interval (NPRM, ¶ 62 & App. A, § II. C.3). A jeopardy notice is issued when a customer's order is in danger of not being completed as scheduled. Ameritech network personnel use "jeopardies" to internally monitor order status through the

network, to identify and resolve roadblocks and resource issues, and to improve due date performance. The lion's share of such notices are minor enough to allow resolution well in advance of the due date, with no impact on customer service. In the event that network personnel are nonetheless unable to resolve a jeopardy on a CLEC order before 24 hours in advance of the order due date, Ameritech informs the CLEC. By contrast, Ameritech retail representatives do not use jeopardy information in the ordinary course.

The NPRM, however, envisions a very different role for jeopardy notices; namely, "to inform [CLEC] customers of the potential need to reschedule the time for service installation." NPRM, ¶ 62. Thus, it proposes an "average jeopardy notice interval" that would "determine how far in advance a competing carrier receives [the jeopardy] notice, compared to how far in advance an incumbent LEC's service representative receives such notice." Ameritech respectfully disagrees with this proposed measure, which does not reflect real-world operations.

It bears repeating, at the outset, that jeopardy notices are but a means to an end -- namely, the improvement of the incumbent LEC's due date performance. So long as due dates are met, the jeopardy notice has served its purpose. There is no impact on customer service and no need to create a separate performance measure. At most, the provision of jeopardy notices is a secondary measure that has meaning only if the primary measure (due dates not met) indicates some concern that bears further investigation.

Moreover, the proposed measure would not provide useful information, because it does not reflect current operations. As described above, Ameritech attempts to resolve jeopardies within its own network until 24 hours before the due date. As a result, Ameritech does not

provide CLECs with a jeopardy notice unless the issue is not resolved by that time; thus, the "average jeopardy notice interval" would never be more than 24 hours. Earlier notification would likely raise numerous "false alarms" and unnecessary escalations, and would thus be counterproductive for both CLECs and incumbent LECs. Meanwhile, Ameritech's retail representatives do not use jeopardy notices in the normal course -- thus, the parity measure envisioned by the NPRM simply does not exist. Nor can there be any parity issue in this area.

Percentage of Orders Given Jeopardy Notices (NPRM, ¶ 63 & App. A, § II.C.4). Ameritech objects to this measure for the same reasons it objects to the proposed measure of jeopardy notice intervals described in the preceding paragraphs. Again, the primary measures of order timeliness should be "Average Completion Interval" and "Due Dates Not Met." Those measures already address the Commission's concern that incumbents might improperly complete retail orders first, and are sufficient to detect any material level of such discrimination. Indeed, the measure for jeopardy notices would be counterproductive, because it would penalize incumbent LECs for issuing jeopardy notices, which are an important internal method for improving due date performance.

Average Completion Notice Interval (NPRM, ¶ 64 & App. A, § II.C.5). This measures the interval between the physical completion of an order and the time the CLEC receives notice of completion so that it may begin billing the end user. As with the proposed measurements for rejection notice and FOC intervals, Ameritech concurs generally with the measurement definition and calculation here, but disagrees with the inclusion of "time" in the calculation and with the Commission's proposed 19-layer disaggregation. The hour and minute

of notification cannot be provided for the reasons discussed under average completion interval above. Next, the separate categories for dispatch and non-dispatch orders would be unduly burdensome to implement, and would be uninformative. Whatever effect the dispatch of personnel may have on the *physical* completion of an order, it does not affect the time required to generate a notice *after* the order has been completed. Notification is an electronic function that occurs after dispatch, and physical work, are complete.

Reporting for Unbundled Transport and EOI (Interconnection Trunks) would likewise be meaningless, and should not be required, because these orders are always coordinated completions. Due to the coordinated nature of these orders, the competing carrier effectively receives notification upon completion, because it is directly involved in the activities leading to completion and acceptance.

Interim Number Portability ("INP") should not be reported separately for the reasons described above with respect to average completion intervals. Ameritech's electronic systems are unable to locate and combine the Number Portability order that matches a given loop, and it would not be meaningful or cost-effective to construct by hand a combined measure for these separate orders especially because all of the numbers Ameritech has ported under INP now are scheduled to be converted to long-term number portability by February 1999.

e. Average Interval for Held Orders

This measure (NPRM, ¶¶ 65-67 & App. A, § II.D) addresses the time required to complete held orders, which are defined as all past-due orders pending at the end of a reporting period. The Notice acknowledges (¶ 67) that certain incumbent LECs already measure, or are

willing to measure, the percentage of orders held due to lack of facilities, but proposes a broader measurement for all held orders.

Ameritech sees no benefit in this measure. The NPRM (¶ 65) states that "this measurement seeks to capture the time required to complete held orders." However, the measure being proposed is a snapshot in time reflecting the number of held orders at one point in time and how long they have been held thus far, not the time required to complete the order. This does not help the carrier in determining if the average period that its orders are pending after the committed due date is any longer than the average period for similar incumbent LEC orders (NPRM, ¶ 65).

To measure performance in this area, Ameritech proposes an alternative measure -- Average Interval for Past Due Orders. This measure addresses the average number of days to complete orders not completed on their original due date. The proposed measurement will provide the number of days from Due Date to completion on all orders that were completed after the original assigned Due Date, divided by the total number of orders past due for that reporting period. The Average Interval for Past Due Orders measurement will enable a requesting carrier to determine whether the average period that its orders are completed after the committed date is longer than the average period for similar incumbent LEC orders.

The Average Intervals for Past Due Orders is calculated using the total number of days between original due date and completion date on past due orders divided by the total number of orders past due. This calculation is based on totals at the end of the month and includes weekend and holidays. This calculation excludes all order activities of the ILEC that are associated with

its internal or administrative use of local services and orders canceled by the carrier. Ameritech recommends the same exclusions and disaggregation categories that it advocates for Percentage of Due Dates Missed above.

f. Installation Troubles

Ameritech generally supports this measure and its definition. However, Ameritech maintains that trouble disposition codes would be a more meaningful categorization. Therefore, Ameritech proposes to disaggregate this measure by the type of trouble found in the network (*e.g.* a central offices trouble or a facility trouble) as detailed in Appendix A.

As is discussed in detail under the Interconnection Measurements section below, the call completion measure encompasses installation troubles. Therefore, Ameritech does not support the inclusion of interconnection trunks under this measure.

g. Ordering Quality Measurements

Percentage of Order Flow Through (NPRM, ¶¶ 71-74 & App. A, § II.F.1). This measures the percentage of CLEC orders that pass through Ameritech's ordering interface, and into Ameritech's "back office" or "Legacy" provisioning systems, without need for manual intervention. As the NPRM properly recognizes (¶ 71), flow through does not measure the provisioning or completion of the order, only its transmission to the back office system.[5/]

Ameritech concurs with the definition, calculation, and level of disaggregation proposed in the NPRM, although some clarification is necessary. Although the denominator to be used in

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[5/] Ameritech does not agree with the Commission's dictum that "[e]lectronically processed service orders are more likely to be completed and less prone to human error than orders that require some human intervention." Because that issue is not within the scope of the proposed Rulemaking, however, Ameritech does not address it herein.

this measure properly excludes rejected orders, it is not entirely clear from the NPRM that orders submitted by non-electronic means are to be similarly excluded. It would, of course, be inaccurate and unfair to include such orders -- which, by definition, cannot flow through electronically because the CLEC has chosen not to submit them electronically -- in a flow through calculation, and Ameritech assumes that the NPRM does contemplate their exclusion. Likewise, flow through should only be calculated for line-based services and not for trunk side services like unbundled transport and interconnection trunks, which are not designed for flow through.

As for an Ameritech analog, no direct retail equivalent is available since there is not a comparable retail interface. (Ameritech representatives type retail orders into the Legacy systems themselves; the same input occurs for CLEC orders that do not flow through and require manual intervention.) For this reason, Ameritech proposes that win-back order activity be used as an alternative.

Percentage of Rejected Orders (NPRM, ¶ 75 & App. A, § II.F.2). This measures the rate of CLEC orders that fail to meet the edit checks performed by the electronic ordering interface and are returned to the CLEC with a rejection notice. As with the "flow through" measure discussed above, Ameritech concurs with the definition, calculation, and level of disaggregation proposed in the NPRM, assuming that orders submitted by non-electronic means or by Access Service Request (orders for unbundled transport or interconnection trunks) are to be excluded. Also, Ameritech proposes that win-back order activity be used for assessing parity, as there is no retail analog for the interface edits involved. Ameritech does not concur, however,

with those CLECs who contend that order rejections reflect "problems in obtaining access" to OSS, or the Commission's apparent sympathy for their position (¶ 75). Rejections are most often driven by the CLECs themselves, when they submit improper or incomplete orders. As a result, this measure primarily relates to CLEC performance errors and the incumbent's ability to detect them.

Average Submissions per Order (NPRM, ¶ 76 & App. A, § II.C.3). The Commission intends this measurement as a way to evaluate the quality of access to an incumbent LEC's ordering system, by reporting the average number of times an order must be resubmitted before it is finally accepted as a valid order. Ameritech does not believe that the measure proposed by the NPRM serves either purpose. Resubmissions are usually driven by incomplete or inaccurate orders submitted by competing carriers themselves, not by problems in obtaining access to the incumbent's ordering system. Again, then, this is not truly a measure of incumbent performance.

Moreover, the proposed formula does not even succeed on its own terms in reporting the average number of submissions per order. The NPRM takes the number of orders accepted for provisioning, adds the number of orders rejected, and divides the sum by the number of orders accepted for provisioning. In order for this formula to work, a CLEC would have to resubmit rejected orders within the same reporting period; otherwise, a rejected order would inflate the current period's statistics, while the incumbent would not receive credit for a successful resubmission until the next reporting period. But not all rejects are resubmitted within the same reporting period, and indeed some rejected orders are not resubmitted at all. Thus, using the "number of orders rejected" leads to fluctuations in the measurement, not based on actual